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22 DAVID TRUNG DUONG

23 UNITED STATES DISTRICT COURT
24 NORTHERN DISTRICT OF CALIFORNIA
25 OAKLAND DIVISION

26 UNITED STATES OF AMERICA,

27 Plaintiff,

28 v.

SHENG THAO, ANDRE JONES, DAVID
TRUNG DUONG, and ANDY HUNG
DUONG,

Defendants.

Case No. 4:25-CR-00003-YGR

**REPLY DECLARATION OF SOOAH
SOHR IN SUPPORT OF DAVID
DUONG'S MOTION TO MODIFY
FILTER TEAM PROTOCOL**

Hearing Date: April 24, 2025

Hearing Time: 10:30 a.m.

Judge: Hon. Yvonne Gonzalez Rogers

Courtroom: 1, 4th Floor

1 I submit this Declaration in support of Defendant David Duong's Reply Motion to Modify
2 Filter Team Protocol. I am over 21 years of age and am competent to testify to the following
3 facts and opinions, all of which are true and correct to the best of my knowledge, information,
4 and belief.

5 1. I am In-house Counsel for California Waste Solutions ("CWS") and have served in that
6 capacity since 2015.

7 2. In the early morning on June 20, 2024, I was notified that law enforcement agents were
8 inside our office. I accessed our office and saw law enforcement agents working inside our
9 network server room and in other locations in our office.

10 3. I spoke with IRS agent Christine Stegner, who I understood to be the lead agent at our
11 office that morning. I told Agent Stegner that I was in-house counsel for CWS and had privileged
12 information stored in several locations inside CWS's office space—including my office, David
13 Duong's office, our CFO's office (Kristina Duong), and our HR manager's office (David
14 Kennedy). I asked that the agents not seize our privileged information.

15 4. When I first met Agent Stegner that morning in our office, my office door was closed
16 and locked. Agent Stegner instructed me to open my office door. After I opened my office for
17 her, Agent Stegner asked me to leave CWS's office. I followed her instruction and left the
18 building. When I returned after the agents completed their search, I noticed that documents inside
19 my personal office had been moved.

20 I declare under penalty of perjury that the foregoing is true and correct.

21 Executed on April 8, 2025 at Oakland, California.

22 
23 Soah Sohr

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CERTIFICATE OF SERVICE

I, Trudy Carney, declare:

I am a citizen of the United States and employed in Santa Clara County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is Silicon Valley Office, 1755 Embarcadero Road, Palo Alto, California 94303. On April 10, 2025, I served a copy Reply Declaration of Sooah Sohr in Support of David Duong's Motion to Modify Filter Team Protocol by electronic transmission.

I am familiar with the USDC Northern District's practice for collecting and processing electronic filings. Under that practice, documents are electronically filed with the court. The court's CM/ECF system will generate a Notice of Electronic Filing (NEF) to the filing party, the assigned judge, and any registered users in the case. The NEF will constitute service of the document. Registration as a CM/ECF user constitutes consent to electronic service through the court's transmission facilities.

Executed on April 10, 2025, Palo Alto, California.


Trudy Carney

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